

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: :
Plaintiff, :
: :
v. : Criminal Action No. 06-08-KAJ
: :
: :
RICHARD REID, :
: :
Defendant. :
:

MOTION FOR CONTINUANCE OF TRIAL

Defendant, Richard Reid, through undersigned counsel, Eleni Kousoulis, hereby moves this Honorable Court for an order re-scheduling the trial in this matter. In support of the motion, the defense submits as follows:

1. This matter is currently scheduled for a 2-day trial beginning on January 17, 2007.
2. Defense counsel requires additional time to investigate and prepare for trial and does not anticipate being ready to proceed to trial on January 17, 2007.
3. In order for defense counsel to effectively represent Mr. Reid, a short continuance of three weeks is needed to complete needed investigation and preparation.
4. AUSA Sophie Bryan, the attorney handling this case for the government, does not oppose the defense's request for a continuance.

WHEREFORE, the defense respectfully requests that the Court re-schedule the trial in this matter for a date in February, 2007, anytime after February 6, 2007.¹

Respectfully submitted,

/s/

Eleni Kousoulis, Esquire
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Defendant Richard Reid

DATED: January 4, 2007

¹This trial is anticipated to last no longer than 2 days. All parties are available anytime in February after February 6, 2007, with the exception of the following dates: the government is not available on February 13, 2007, and defense counsel is not available February 20 and 21, 2007.

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CERTIFICATE OF SERVICE

The undersigned attorney for defendant Richard Reid hereby certifies that a copy of Defendant's Motion for Continuation of Trial is available for public viewing and downloading and was electronically delivered on January 4, 2007, to:

Sophie Bryan, Esquire
Assistant U.S. Attorney
United States Attorney's Office
1007 Orange Street, Suite 700
Wilmington, DE 19801

/s/ _____
Eleni Kousoulis, Esquire
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, DE 19801
Attorney for Defendant Richard Reid

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ORDER

Having considered Defendant Reid's Motion for Continuance of Trial, **IT IS HEREBY ORDERED** this _____ day of _____, 2007, that Defendant Reid's trial in this matter be rescheduled for the _____ day of _____, 2007.

Honorable Sue L. Robinson
United States District Court